

FILED

MAR 22 2024

Clerk of Court, United States District Court
Ohio Northern District - AKRON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN HENSLEY,

Defendant.

) INFORMATION

) **JUDGE RUIZ**

) **5 : 24 CR 101**

) CASE NO.

) Title 18, United States Code,
) Sections 1028A(a)(1), 1343, and
) 1344

MAG. JUDGE PARKER

GENERAL ALLEGATIONS

1. L.M., J.Y., D.C., A.S., J.F., R.F., B.F., P.R., J.R., G.G., R.S., D.B., M.K., D.M., and T.C., are all persons whose identities are known to the United States Attorney and who are collectively referred to herein as “the Victims.”

2. At all times material to this information, Huntington Bank, Chase Bank, Comenity Capital Bank, CitiBank, The Farmers National Bank of Canfield, Varo Bank, Credit One Bank, Lincoln Savings Bank (CashApp) and Capital One Bank were financial institutions, as defined under Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation, a federal government agency that insures bank deposits against substantial losses with the two-fold aim of preventing a bank’s collapse and instilling public confidence in the nation’s banking system.

3. The term “means of identification,” as defined under Title 18, United States Code, Section 1028(d)(7), for purposes of this Information, means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual and

includes any name, social security number, date of birth, official State or government issued driver's license or identification number, and unique electronic identification number, address, or routing code, including an email address and bank account number.

COUNTS 1-4
(Wire Fraud, 18 U.S.C. § 1343)

The United States Attorney charges:

4. On or about the dates listed in the table below, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant CHRISTIAN HENSLEY knowingly devised and intended to devise a scheme to defraud various individuals, businesses, and financial institutions, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

5. It was part of the scheme that:

- a. HENSLEY unlawfully acquired personal identifying information, including names, dates of birth, social security numbers, email addresses, and account numbers, of the Victims without their knowledge and consent.
- b. HENSLEY used the personal identifying information of the Victims to fraudulently gain access to online accounts belonging to the Victims and to create fraudulent online accounts in the names of the Victims for the purposes of obtaining money and property.
- c. HENSLEY used the personal identifying information of the Victims to fraudulently gain online access to email accounts belonging to the Victims and used those email accounts to falsely and fraudulently hold himself out to be the Victims in various online activities for the purposes of obtaining money and property.
- d. HENSLEY used personal identifying information of the Victims to

fraudulently apply for monetary loans in the names of the Victims and of businesses associated with the Victims for the purpose of obtaining money.

e. As a result of this activity, HENSLEY defrauded and attempted to defraud the Victims and unsuspecting third parties out of money and property valued over \$400,000.

f. As a result of Defendant HENSLEY'S conduct in executing the scheme, Rent-a-Center and Progressive Leasing suffered monetary losses.

6. HENSLEY, acting with the intent to defraud and for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, and sounds, to wit: fraudulent financial applications, on or about the dates listed below, each constituting a separate count:

COUNT	DATE	WIRE COMMUNICATION
1	November 1, 2021	Rental agreement application to Rent-a-Center in the name of G.G.
2	July 3, 2021	Lease-purchase application to Progressive Leasing in the name of R.F.
3	September 15, 2022	Loan application to Rock Solid Funding in the name of A.S.
4	February 8, 2023	Loan application to Clara Capital in the name of L.M.

All in violation of Title 18, United States Code, Section 1343.

COUNT 5
(Bank Fraud, 18 U.S.C. § 1344)

The United States Attorney further charges:

7. Paragraphs 1 through 3 of this Information are re-alleged and are incorporated by reference as if fully set forth herein.

8. From in or around December 2020, and continuing to in or around February 2023, Defendant CHRISTIAN HENSLEY knowingly executed a scheme to obtain money, funds, and

other property owned by, and under the custody and control of, financial institutions, to wit: Huntington Bank, Chase Bank, Comenity Capital Bank, CitiBank, The Farmers National Bank of Canfield, Varo Bank, Credit One Bank, Lincoln Savings Bank (CashApp) and Capital One Bank, by means of false and fraudulent pretenses, representations, or promises.

MANNER AND MEANS

9. It was part of the scheme that:

a. HENSLEY used unlawfully obtained personal identifying information of other persons, to wit: the Victims to open deposit accounts and credit card accounts in the names of the Victims at financial institutions. HENSLEY obtained funds from the accounts and used the accounts to receive and attempt to receive proceeds of fraudulently obtained loans.

b. HENSLEY used unlawfully obtained personal identifying information of other persons, to wit: the Victims, to fraudulently gain access to accounts belonging to the Victims at financial institutions. HENSLEY initiated transfers of funds from such accounts to pay for online purchases, to fund accounts which HENSLEY fraudulently opened in the names of other persons, and to transfer funds to accounts controlled by HENSLEY and associates of HENSLEY.

c. HENSLEY, in executing the scheme to defraud, used computers located in the Northern District of Ohio, Eastern Division, to open deposit accounts and credit card accounts in the names of the Victims at financial institutions, to fraudulently gain access to accounts belonging to the Victims at financial institutions, and to initiate transfers of funds from such accounts.

10. As a result of HENSLEY'S conduct in executing the scheme, Huntington Bank, Chase Bank, Comenity Capital Bank, CitiBank, The Farmers National Bank of Canfield, Varo

Bank, Credit One Bank, Lincoln Savings Bank (CashApp) and Capital One Bank suffered monetary losses.

All in violation of Title 18, United States Code, Section 1344.

COUNT 6
(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The United States Attorney further charges:

11. Paragraphs 1 through 3 of this Information are re-alleged and are incorporated by reference as if fully set forth herein.

12. On or about September 15, 2022, in the Northern District of Ohio, Eastern Division, Defendant CHRISTIAN HENSLEY did knowingly transfer and use, without lawful authority, a means of identification of another person, to wit: the date of birth and social security number of A.S., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: the commission of Wire Fraud, a violation of Title 18, United States Code, Section 1343, as set forth in Count 3 herein, knowing that the means of identification belonged to A.S., an actual person known to the United States Attorney, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 7
(Aggravated Identity Theft, 18 U.S.C. § 1028A(a)(1))

The United States Attorney further charges:


13. Paragraphs 1 through 3 of this Information are re-alleged and are incorporated by reference as if fully set forth herein.

14. On or about February 8, 2023, in the Northern District of Ohio, Eastern Division, Defendant CHRISTIAN HENSLEY did knowingly transfer and use, without lawful authority, a means of identification of another person, to wit: the date of birth, social security number, and

email address of L.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: the commission of Wire Fraud, a violation of Title 18, United States Code, Section 1343, as set forth in Count 4 herein, knowing that the means of identification belonged to L.M., an actual person known to the United States Attorney, in violation of Title 18, United States Code, Section 1028A(a)(1).

REBECCA C. LUTZKO
United States Attorney

By:



David M. Toepfer
Chief, Akron & Youngstown Branch